

1 SEDGWICK, DETERT, MORAN & ARNOLD LLP
2 JAMES P. DIWIK Bar No. 164016
3 MARY CREER RICHARDSON Bar No. 208586
One Embarcadero Center, 16th Floor
3 San Francisco, CA 94111-3628
Telephone: (415) 781-7900
4 Facsimile: (415) 781-2635

5 Attorneys for Plaintiff
SAFECO INSURANCE COMPANY OF AMERICA

6 MCKAGUE & TONG, LLP
7 DARON D. TONG Bar No. 96220
MICHELE MILLER Bar No. 213723
8 250 Montgomery Street, Suite 1100
San Francisco, CA 94104
9 Telephone: (415) 409-5222
Facsimile: (415) 704-0467

10 Attorneys for Defendants
11 LORI CHIANG, ROBERT CHIANG AND CHIANG
C.M. CONSTRUCTION

12
13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17
18 SAFECO INSURANCE COMPANY OF
AMERICA,

19 Plaintiff,

20 v.

21 LORI CHIANG, ROBERT CHIANG, and
CHIANG C.M. CONSTRUCTION
COMPANY, INC.,
22 Defendants.

23 CASE NO. C 04-1977 SC

**STIPULATION FOR ADR AND
CONTINUED CASE MANAGEMENT
CONFERENCE; ~~PROPOSED~~ ORDER**

24 Case Management Conference: August 18, 2005
25 Time: 10:00 a.m.
26 The Honorable Samuel Conti

27 Plaintiff Safeco Insurance Company of America and Defendants Lori Chiang, Robert
28 Chiang, and Chiang C.M. Construction Company, Inc. previously stipulated to participate in
private mediation. The parties herein jointly request that the parties be given an additional 90-
day extension to complete mediation and further request that the status conference in this matter
scheduled for August 18, 2005 at 10:00 a.m. be continued. The parties request the extension in

1 order to allow the parties to complete discovery in this matter and give the parties an opportunity
2 to work towards informal resolution of this matter without the need for formal mediation.
3 Further, the requested extension will permit the parties to further investigate and monitor related
4 proceedings pending in the Superior Court for the City and County of San Francisco. Counsel
5 have met and conferred and agree that discovery of information from the related cases is
6 necessary for determining a portion of the damages sought by Safeco against defendants in this
7 action and for meaningful participation of all parties in formal mediation. The parties further
8 agree that the parties can be permitted to file motions for summary judgment during the time that
9 the case is referred to mediation.

10 DATED: August 11, 2005

11 SEDGWICK, DETERT, MORAN & ARNOLD LLP

12

13

14 By:/s/ Mary C. Richardson

15 James P. Diwik

16 Mary Creer Richardson

17 Attorneys for Plaintiff

18 SAFECO INSURANCE COMPANY OF

19 AMERICA

20 SIGNATURE ATTESTATION: I, Mary Creer Richardson, counsel for plaintiff Safeco
21 Insurance Company of America, attest that concurrence in the filing of this document has been
22 obtained by Michele Miller, Esq., counsel for defendants as set forth above.

23 DATED: August 11, 2005

24 MCKAGUE AND TONG, LLP

25

26

27

28

29 By:/s/ Michele Miller

30 Daron D. Tong

31 Michele Miller

32 Attorneys for Defendants

33 LORI CHIANG, ROBERT CHIANG & CHIANG

34 C.M. CONSTRUCTION

PROPOSED ORDER

The parties shall complete mediation pursuant to the Stipulation.

The status conference in this matter scheduled for August 18, 2005 at 10:00 a.m. is hereby continued to Nov. 18, 2005. The parties are permitted to file motions for summary judgment during the time that the case is referred to mediation.

It is so ordered.

Dated: 8/16/05

